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REPLY TO Wilmington Office

August 25, 2005

**VIA HAND DELIVERY**

Chief Judge Sue L. Robinson  
United States District Court  
District of Delaware  
844 North King Street  
Wilmington, DE 19801

Re: *Versus Technology, Inc. v. Radianse, Inc.*,  
Civil Action No. 04-1231-SLR

Dear Chief Judge Robinson:

Please find enclosed the letter you requested from Plaintiff's software expert, Mr. Leipold, during our August 23<sup>rd</sup> conference. Per your request, Mr. Leipold's letter addresses: (1) the specific tools Mr. Leipold believes are necessary to support the present analysis, and (2) proposed enhancements to Your Honor's "Default Standard for Access to Source Code."

Additionally, I enclose a letter from the escrow agent, Iron Mountain, confirming that the tools identified by Mr. Leipold are technically justified and reasonable.

We are happy to provide additional information at your request.

Respectfully submitted,

James M. Lennon  
(DE Bar # 4570)

Enclosures

cc: Sibley Reppert, Esq. (via email w/encl.)  
Josy W. Ingersoll, Esq. (via hand delivery, w/ encl.)